

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs,

v.

THE PALESTINIAN AUTHORITY, et al.,

Defendants.

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) C.A. No. 00-105L
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**DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL THE
DEPOSITION OF AHMED QUREI**

On September 9, 2010, Defendant the Palestine Liberation Organization ("PLO") filed a Motion for Entry of a Protective Order Regarding Plaintiffs' Notice of Taking the Deposition of Ahmed Qurei. Dkt. No. 528. Plaintiffs' opposition was due September 28. *See* Dkt. No. 550.

On September 29, Plaintiffs filed a "Memorandum in Support of Plaintiffs-Judgment Creditors' Motion to Compel the Deposition of Ahmed Qurei *and* in Opposition to the PLO's Motion for a Protective Order" (Dkt. No. 554), accompanied by a Motion for Leave to File *Instanter* (Dkt. No. 555). At the same time, Plaintiffs filed a Motion to Compel the Deposition of Ahmed Qurei (Dkt. No. 556), accompanied by the same memorandum that constituted their opposition to the PLO's motion for protective order. *See* Dkt. No. 556-1.

As the PLO already responded to Plaintiffs' memorandum in its reply to Plaintiffs' opposition to the PLO's motion for a protective order, *see* Dkt. No. 562, that reply should be treated as constituting the PLO's opposition to Plaintiffs' motion to compel. Because it adds needless complexity and delay, Plaintiffs are not entitled to create an opportunity for the "last word" by accompanying opposition briefs with a new motion.

Defendants thus file this “Opposition” only to make the record clear that Plaintiffs’ motion to compel is opposed for the reasons stated in the PLO’s reply brief (Dkt. No. 562) and to state their position that Plaintiffs are not entitled to what essentially is a sur-reply on the Qurei issue by pursuing the dual-purpose memorandum tactic.

Respectfully submitted,

Dated: October 18, 2010

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 18th day of October 2010, a true and genuine copy of the foregoing was filed by ECF, which will automatically send notification and a copy of such filing to:

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